

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SOLAS OLED LTD.,

Plaintiff,

V.

SAMSUNG DISPLAY CO., LTD.,
SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

CIVIL ACTION NO. 2:19-CV-00152-JRG

ORDER

Before the Court is the Joint Motion to Enter Stipulated Order on Execution of Judgment Against Defendants (the “Motion”) filed by Plaintiff Solas OLED Ltd. (“Plaintiff”) and Defendants Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., and Samsung Display Co., Ltd. (collectively, “Defendants”). (Dkt. No. 369).

The parties have agreed as follows:

1. Defendants will not be required to post bond or other security pending appeal. Plaintiff has agreed to accept the verification of Exhibit A to this Stipulated Order as sufficient evidence of Defendants' present ability, collectively or individually, to satisfy the Judgment entered in this matter (including all pre-judgment/post-judgment interest and costs) (*see* Dkt. No. 356).

2. Defendants further agree (i) to provide updated verifications, in the form of Exhibit B hereto, to Plaintiff on a quarterly basis, confirming Defendants' continuing ability to satisfy the Judgment in this matter and (ii) to report to Plaintiff, in the form of Exhibit C hereto, within seven days of Defendants' determination that their ability to satisfy the Judgment in this matter is compromised.

3. Defendants agree that, as provided in Exhibit A, they will pay any payment then due under the Judgment (including all pre-judgment/post-judgment interest and costs) within thirty (30) days after the Judgment becomes final, unappealable, and no longer subject to review in the Supreme Court of the United States by petition for writ of certiorari.


4. In reliance on the certification of Exhibit A and Defendants' obligations in paragraphs 2 and 3 immediately above, Plaintiff agrees that it will not execute Judgment before 30 days after the completion of proceedings as provided in paragraph 3.

5. Any party may move the Court for modification, failing agreement between the parties on such modification, under any circumstances which that party deems sufficient to justify modification.

(See Dkt. No. 369-4).

Having considered the Motion, the Court finds that it should be and hereby is **GRANTED**. It is **ORDERED** that the parties' stipulation is in effect.

So ORDERED and SIGNED this 14th day of April, 2021.



RODNEY GILSTRAP
UNITED STATES DISTRICT JUDGE

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOLAS OLED LTD.

Plaintiff,

v.

SAMSUNG DISPLAY CO., LTD.,
SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:19-cv-00152-JRG

DECLARATION OF CHANG SIK KIM

I, Chang Sik KIM, Head of IP Legal & Strategy Team of Samsung Display Co., Ltd., hereby declare as follows:

1. Samsung Display Co., Ltd. has the financial wherewithal to satisfy the Judgment awarded to Plaintiff Solas OLED Ltd., including all pre-judgment and post-judgment interest, in the case currently captioned *Solas OLED Ltd. v. Samsung Display Co., Ltd. et al.*, Civil Action No. 2:19-cv-00152-JRG (E.D. Tex.).

2. Within 30 days after all appeal and remand proceedings (including any appeals from remand proceedings) have been completed, Samsung Display Co., Ltd. will make all payments then due under the Judgment by wire transfer to an account specified in writing by Plaintiff Solas OLED Ltd.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th
day of April, 2021, in South Korea.

A handwritten signature in blue ink, appearing to read 'Chang Sik KIM', is written over a horizontal line.

Chang Sik KIM

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOLAS OLED LTD.

Plaintiff,

v.

SAMSUNG DISPLAY CO., LTD.,
SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:19-cv-00152-JRG

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DECLARATION OF JAEHWAN KIM

I, Jaehwan Kim, Head of IP Legal Group 1 of Samsung Electronics Co., Ltd.,
hereby declare as follows:

1. Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc.,
individually and collectively, have the financial wherewithal to satisfy the Judgment awarded to
Plaintiff Solas OLED Ltd., including all pre-judgment and post-judgment interest, in the case
currently captioned *Solas OLED Ltd. v. Samsung Display Co., Ltd. et al.*, Civil Action No. 2:19-
cv-00152-JRG (E.D. Tex.).

2. Within 30 days after all appeal and remand proceedings (including any
appeals from remand proceedings) have been completed, Samsung Electronics Co., Ltd. and/or
Samsung Electronics America, Inc. will make all payments then due under the Judgment by wire
transfer to an account specified in writing by Plaintiff Solas OLED Ltd.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of April, 2021, in Seoul, South Korea.



EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOLAS OLED LTD.

Plaintiff,

v.

SAMSUNG DISPLAY CO., LTD.,
SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:19-cv-00152-JRG

CERTIFICATION

I, Chang Sik KIM, Head of IP Legal & Strategy Team of Samsung Display Co., Ltd., do hereby certify as follows:

Samsung Display Co., Ltd. has the continuing financial wherewithal to satisfy the Judgment awarded to Plaintiff Solas OLED Ltd., including all pre-judgment and post-judgment interest, in the case currently captioned *Solas OLED Ltd. v. Samsung Display Co., Ltd. et al.*, Civil Action No. 2:19-cv-00152-JRG (E.D. Tex.).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of April, 2021, in South Korea.



Chang Sik KIM

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOLAS OLED LTD.

Plaintiff,

v.

SAMSUNG DISPLAY CO., LTD.,
SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:19-cv-00152-JRG

CERTIFICATION

I, Jaehwan Kim, Head of IP Legal Group 1 of Samsung Electronics Co., Ltd., do hereby certify as follows:

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., individually and collectively, have the continuing financial wherewithal to satisfy the Judgment awarded to Plaintiff Solas OLED Ltd., including all pre-judgment and post-judgment interest, in the case currently captioned *Solas OLED Ltd. v. Samsung Display Co., Ltd. et al.*, Civil Action No. 2:19-cv-00152-JRG (E.D. Tex.).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 8th day of April, 2021, in Seoul, South Korea.



EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

SOLAS OLED LTD.

Plaintiff,

v.

SAMSUNG DISPLAY CO., LTD.,
SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:19-cv-00152-JRG

CERTIFICATION

I, _____, _____ of Samsung Electronics Co., Ltd., do hereby
certify as follows:

Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc., individually and
collectively, have the continuing financial wherewithal to satisfy the Judgment awarded to
Plaintiff Solas OLED Ltd., including all pre-judgment and post-judgment interest, in the case
currently captioned *Solas OLED Ltd. v. Samsung Display Co., Ltd. et al.*, Civil Action No. 2:19-
cv-00152-JRG (E.D. Tex.).

I declare under penalty of perjury that the foregoing is true and correct. Executed this ____
day of _____, 202[___], in _____.

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

SOLAS OLED LTD.

Plaintiff,

v.

SAMSUNG DISPLAY CO., LTD.,
SAMSUNG ELECTRONICS CO., LTD.,
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendants.

Civil Action No. 2:19-cv-00152-JRG

CERTIFICATION

I, _____, _____ of Samsung Display Co., Ltd., do hereby
certify as follows:

Samsung Display Co., Ltd. has the continuing financial wherewithal to satisfy the
Judgment awarded to Plaintiff Solas OLED Ltd., including all pre-judgment and post-judgment
interest, in the case currently captioned *Solas OLED Ltd. v. Samsung Display Co., Ltd. et al.*,
Civil Action No. 2:19-cv-00152-JRG (E.D. Tex.).

I declare under penalty of perjury that the foregoing is true and correct. Executed this ____
day of _____, 202[___], in _____.
